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August 2, 2017

VIA ECF

The Honorable Barbara C. Moses
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Campbell, et al. v. Chadbourne & Parke LLP, et al.
Civil No. 1:16-cv-06832 (JPO)(BCM)

Dear Judge Moses:

Pursuant to the Court's Order of July 5, 2017 (Dkt. No. 112), Plaintiffs today are filing an amended complaint which adds (i) allegations provided by Mary Yelenick, who joined this action as an opt-in plaintiff after the First Amended Complaint was filed and who advances allegations both in her individual capacity and on behalf of the proposed class, and (ii) allegations regarding Chadbourne's successor firm, Norton Rose Fulbright US LLP.

The complaint also includes a number of minor modifications that streamline and clarify the complaint, including rendering allegations pertaining to Chadbourne in the past tense, deleting or narrowing certain allegations, and moving other allegations in order to promote consistency and readability. These modifications will benefit all parties and the Court by promoting clarity in the pleadings. Accordingly, and in an abundance of caution, Plaintiffs hereby seek leave of this Court under Rule 15 to make the additional modifications to the complaint.

Pursuant to Judge Oetken's prior Order on June 14, 2017 (Dkt. No. 108), no allegations have been added to the complaint regarding Chadbourne's further acts of retaliation against Plaintiff since the filing of the First Amended Complaint. However, in light of the limited substantive amendments permitted by the Court at this time, Plaintiffs reserve the right to seek leave to supplement the pleadings at appropriate juncture (such as after the Court decides Defendants' contemplated, renewed summary judgment motion) to include additional substantive allegations not set forth in Plaintiffs' Second Amended Complaint.

In a further abundance of caution, Plaintiff hereby seeks leave to redact from the complaint certain allegations containing financial and/or compensation information relating to, or otherwise identifying, certain other Chadbourne partners. The proposed redactions are consistent with Judge Oetken's prior orders authorizing the redaction of this information (Dkt. Nos. 69, 70, and 76).

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Plaintiffs conferred with Defendants regarding these requests and provided Defendants with the opportunity to consent. Defendants indicated that they will consider the requests in consultation with their clients following review of Plaintiffs' complaint.

Plaintiffs thank the Court for its consideration of these requests.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "David Sanford", is written above the printed name.

David Sanford